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9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION  
12

13 UNITED STATES OF AMERICA,	) NO. CR 3:23-CR-00491-JD
14 Plaintiff,	) STIPULATION TO CONTINUE STATUS
15 v.	) HEARING TO MARCH 25, 2024 AND EXCLUDE
16 JULIO CESAR ROMAN TORRES,	) TIME FROM FEBRUARY 26, 2024 TO MARCH
17 Defendant.	) 25, 2024 AND <del>[PROPOSED]</del> ORDER

18  
19 A status in the above-captioned matter is currently set for February 26, 2024 at 10:30 AM. It is  
20 hereby stipulated by and between counsel for the United States and counsel for the defendant Julio Cesar  
21 Roman Torres, that the status be continued to March 25, 2024 at 10:30 AM and time be excluded under  
22 the Speedy Trial Act from February 26, 2024 through March 25, 2024.

23 The government has produced discovery and extended a plea offer. The defendant is evaluating  
24 the plea offer. The parties believe they will be in a position by March 25, 2024 to either enter a plea or  
25 set a trial date and in the interests of judicial economy believe that a continuance is appropriate. In  
26 addition, the parties seek a continuance because counsel for the United States is unavailable on February  
27 26, 2024. The government and counsel for the defendant agree that time be excluded under the Speedy  
28 Trial Act so that defense counsel can continue to prepare, including by reviewing the discovery already

STIPULATION TO CONTINUE STATUS AND EXCLUDE TIME AND [PROPOSED] ORDER

1 produced. For this reason, the parties stipulate and agree that excluding time from February 26, 2024  
2 through March 25, 2024 will allow for the effective preparation of counsel. *See* 18 U.S.C.  
3 § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding  
4 the time from February 26, 2024 through March 25, 2024 from computation under the Speedy Trial Act  
5 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A),  
6 (B)(iv).

7 The undersigned Assistant United States Attorney certifies that she has obtained approval from  
8 counsel for the defendant to file this stipulation and proposed order.

9  
10 IT IS SO STIPULATED.

11  
12 DATED: February 22, 2024

\_\_\_\_\_  
/s/  
MAYA KARWANDE  
Assistant United States Attorney

13  
14 DATED: February 22, 2024

\_\_\_\_\_  
/s/  
CHARLES WOODSON  
Counsel for Defendant Julio Cesar Roman Torres

~~PROPOSED~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court continues the status set on February 26, 2024 at 10:30 AM to March 25, 2024 at 10:30 AM. The Court finds that failing to exclude the time from February 26, 2024 to March 25, 2024 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from February 26, 2024 to March 25, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the status currently set on February 26, 2024 at 10:30 AM is continued to March 25, 2024 at 10:30 AM and time from February 26, 2024 to March 25, 2024 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: February 22, 2024

  
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HON. JAMES DONATO  
United States District Judge